



**MISSOURI ETHICS COMMISSION**

PO Box 1370

Jefferson City, MO 65102

[www.mec.mo.gov](http://www.mec.mo.gov)

(573) 751-2020 / (800) 392-8660

James Klahr

Executive Director

November 3, 2016

LG PAC

Richard Monsees

520 W 103<sup>rd</sup> Street

Suite 243

Kansas City MO 64114

Re: File No. 16-0076-I

Dear Mr. Monsees:

The Missouri Ethics Commission considered the complaint filed against you and LG PAC at its November 2, 2016 meeting. The Commission reviewed the allegation that you coordinated with Greitens for Missouri in regard to expenditures it made on the behalf of Mr. Greitens' candidacy for Governor in the period leading up to the August 2, 2016 Republican primary.

LG PAC filed its Statement of Organization with the Federal Election Commission on May 16, 2016. Under the entry for Type of Committee, LG PAC identified itself as a Political Action Committee (PAC) and marked the box indicating that it supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee (i.e., nonconnected committee).

Staff review of the complaint determined that LG PAC made expenditures related to the Missouri governor election before the August 2, 2016 primary. In its July 15, 2016 filing with the FEC, it reported making expenditures of just over \$2.2 million. Of this amount, the vast majority of expenditures were listed as going to Main Street Media Group for media buys between June 2 and June 30, 2016.

In its October 15, 2016 FEC filing, LG PAC reported making additional expenditures of over \$2.1 million. The vast majority of these expenditures, reported as being made between July 7 and July 29, 2016, were made to Main Street Media and Outlaw Media. Under the "Purpose for Disbursement" section of each expenditure, LG PAC listed the purpose as "Media buy for State race" and "Media production for state race." Based on follow-up of information contained in the complaint, staff identified that LG PAC was responsible for ads opposing John Brunner and Catherine Hanaway who both were Republican candidates for Governor in the August 2, 2016 primary election.

Staff reviewed the allegation that Greitens for Missouri was aware of the expenditures LG PAC was making in the Missouri's governor race and that Greitens for Missouri was required to report those expenditures as in-kind contributions in support of the Greitens campaign. LG PAC lists its treasurer in its Amended Statement of Organization and subsequent reports filed with FEC as



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Richard Monsees. LG PAC reports its address as 520 W. 103<sup>rd</sup> St, Suite 243, Kansas City, MO, 64114. Mr. Monsees attended a Greitens campaign event in May 2016.

LG PAC through its attorney stated that no one from the Greitens campaign had any participation or knowledge of LG PAC's planned participation in the Missouri governor election prior to LG PAC making these expenditures. Through his attorney, Eric Greitens provided a certified statement denying any prior knowledge about LG PAC's planned media buy prior to LG PAC making those expenditures. Finally, while Mr. Monsees attended one event as a private citizen, both LG PAC's response and Greitens' response denied that Greitens had any relationship with Richard Monsees and that neither Eric Greitens nor Greitens for Missouri had any association with LG PAC. No evidence was found to suggest otherwise.

Based on the information provided, there is no evidence that LG PAC coordinated with Eric Greitens or Greitens for Missouri regarding its expenditures made leading up to the August 2, 2016 Republican gubernatorial primary.

From the facts presented, the Commission finds no reasonable grounds exist to support a violation of Chapter 130, RSMo, and is dismissing the complaint.

Sincerely,

A handwritten signature in black ink, appearing to read "James Klahr".

James Klahr  
Executive Director